

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

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MAIL PROCESSING NETWORK  
RATIONALIZATION SERVICE CHANGES, 2012

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Docket No. N2012-1

INTERROGATORIES OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO  
TO THE UNITED STATES POSTAL SERVICE  
(APWU/USPS-12)  
(February 23, 2012)

Pursuant to Rules 25 through 28 of the Rules of Practice, American Postal Workers Union, AFL-CIO directs the following interrogatories to United States Postal Service.

Instructions and Definitions applicable to these Interrogatories are contained in the Interrogatories of the American Postal Workers Union, AFL-CIO to the United States Postal Service witness David E. Williams (APWU/USPS-T1-1-4), filed on December 22, 2011, and are hereby incorporated by reference.

Respectfully submitted,

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**APWU/USPS-12** In various documents published by the Postal Service among a variety of strategic options and proposals, the competitive parcel market is frequently referenced as an area for future growth. Specifically, the USPS published reports titled “Ensuring a Viable Postal Service” and the “Vision 2013” five year Strategic Plan, among many other reports, have indicated a planned intent to grow the parcel and package component of the USPS revenue stream. Additionally, many outside organizations with whom the USPS maintains relationships, such as Postal Vision 2020, have advocated a redirection of USPS strategy to a greater focus on carrying and delivering “physical goods”.

- a) To address these stated USPS intentions and recommendations from others, has any evaluation been conducted or plan been developed to define future expansion in the parcels sub-categories of the various mail classes?
- b) If so, does that plan evaluate the potential use of the existing network and plant infrastructure to provide future expanded distribution capabilities in parcels and packages?
- c) Has any evaluation been conducted or plan been developed to expand the Priority Mail product in particular in the competitive market?
- d) Has any evaluation been made of the existing processing and transportation network as to how it could be utilized for significant further expansion into parcel sub-categories and Priority Mail in particular?
- e) What are the results of those evaluations and studies regarding the possible future use of the existing network for new expansions?
- f) Has any evaluation been made of the impact the closures and consolidations planned under the network rationalization initiative will have upon the future expansion of parcel and package services? If so, please provide a detailed description of the impacts.